

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

F.M. BUTT HOTEL CORP.

CHAPTER 11

Debtor.

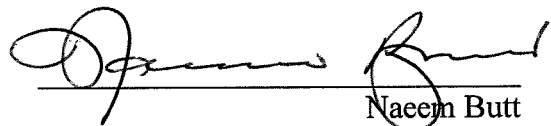
BK No.: 19-20310

AFFIDAVIT OF PRINCIPAL NAEEM BUTT IN OPPOSITION TO RE-FILING BAR

State of New York }
County of Monroe } ss.:

Naeem Butt, principal of F.M. Butt Hotel Corp., being duly sworn, deposes and says:

- (1) I have spoken with Rich Hargrove, officer of Next Level Management and trustee of the Royal Swiss Credit Union, and he has agreed to provide F.M. Butt Hotel Corp. a funding commitment that will provide at least Four Million Dollars for a successful Chapter 11 to reorganize the Debtor and repay Secured Creditor Access Point Financial, LLC over time through a Chapter 11 Plan. The funding commitment will be provided as soon as it is received.
- (2) The funds will be used to bring the property back up to Code so that it can reopen and operate as intended, estimated to cost about One Million Dollars, and there will be significant funds to reinstate the loan with Secured Creditor Access Point Financial, LLC
- (3) A foreclosure is unlikely to result in Access Point Financial, LLC being paid the value of the property versus as an operating entity reorganized in Chapter 11.


Naeem Butt

Sworn to before me this
16th day of January, 2020.


Notary Public

MIKAL KRUEGER
Notary Public, State of New York
Monroe County, #02KR6108445
Commission Expires April 19, 2020